

STATEMENT OF BASIS (AI No. 30054)
PER20060001

for draft Louisiana Pollutant Discharge Elimination System permit No. **LA0110922** to discharge to waters of the State of Louisiana.

THE APPLICANT IS: The Hydrocarbon Flow Specialist, Inc.
Post Office Box 2859
Morgan City, LA 70381

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Lisa Kemp

DATE PREPARED: November 29, 2006

1. PERMIT STATUS

A. Reason For Permit Action:

Permit reissuance of an expired Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term. The discharges from this facility could be covered under general permits. However, due to the history of noncompliance (see Compliance History, Page 3), an individual permit with an increased monitoring frequency will be issued.

B. NPDES permit - NPDES permit effective date: N/A
NPDES permit expiration date: N/A
EPA has not retained enforcement authority.

C. LPDES permits - LPDES permit LA0110922
LPDES permit effective date: August 1, 1999
LPDES permit expiration date: July 31, 2004

LPDES permit LAR05N771*
LPDES permit effective date: November 1, 2006
LPDES permit expiration date: June 30, 2011

* A Notice of Intent for coverage under the Multi-Sector General Permit for stormwater coverage was received by this Office on October 23, 2006. The previous permit, LA0110922, included the discharge of stormwater runoff. Since requirements for the discharge of stormwater runoff will be continued in the reissuance, coverage under LPDES permit LAR05N771 will be canceled upon finalization of the renewal of LPDES permit LA0110922.

D. Date Application Received: October 23, 2006 Additional information was received on November 20, 2006 and November 29, 2006.

2. FACILITY INFORMATION

A. FACILITY TYPE/ACTIVITY - oilfield service facility

The facility rents cutting boxes and tanks to the oil and gas industry. Boxes and tanks are returned to the facility cleaned by the renting company. The exteriors of cutting boxes and tanks are rinsed with

a pressure washer and then sandblasted and/or painted on an as needed basis. Painting is done inside of a paint booth. The discharge is from an equipment washrack. Sanitary wastewater is connected to the Publically Owned Treatment Works.

B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: II*
3. Wastewater Type: III
4. SIC code: 1389

* The points for this facility have been BPJ'd to 0 because of the low volume of wastewater discharged.

C. LOCATION - at 503 Bessie Street, in Patterson, St. Mary Parish
Latitude 29° 40' 43", Longitude 91° 17' 43"

3. OUTFALL INFORMATION

Outfall 001

Discharge Type: equipment washwater combined with stormwater runoff
Treatment: oil/water/solids separator
Location: at the northeast corner of the property
Flow: 50 gpd
Discharge Route: via local drainage to a parish borrow canal; thence into the Intracoastal Waterway

4. RECEIVING WATERS

STREAM - via local drainage to a parish borrow canal; thence into the Intracoastal Waterway

BASIN AND SEGMENT - Atchafalaya River Basin, Segment 010803

DESIGNATED USES - a. primary contact recreation
b. secondary contact recreation
c. propagation of fish and wildlife

5. TMDL STATUS

Subsegment 010803, Intracoastal Waterway, Bayou Boeuf Lock to Bayou Sale, is not listed on LDEQ's Final 2004 303(d) List as impaired, and to date no TMDL's have been established. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by any future TMDLs.

6. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale, Page 6

PROPOSED PERMIT CHANGES

1. TOC monitoring is no longer required based on current LDEQ guidance for permitting discharges of equipment washwater combined with stormwater runoff from similar oilfield service facilities.
2. The monitoring frequency for Outfall 001 has been increased from 1/quarter to 1/month due to a history of noncompliance.
3. The previous permit lists the basin and segment for the receiving stream as Segment 010701 of the Atchafalaya River Basin. Current subsegment maps show the basin and segment for the receiving stream as Segment 010803 of the Atchafalaya River Basin.

7. COMPLIANCE HISTORY/COMMENTS

A. WQMD – Compliance Warning Letter number WE-L-02-0395 was issued to this facility on May 23, 2002 as a result of a compliance inspection performed on January 22, 2002. This inspection revealed that Outfall 001 (equipment washrack and stormwater) was not being sampled and reported as required by the permit. This Office received correspondence from The Hydrocarbon Flow Specialist on February 8, 2002 which stated that testing would begin on a regular basis, a secondary treatment unit would be installed for solids control, and that the facility would seek approval from the local sewer district to allow them to discharge into the local sewage treatment system.

B. Inspection – A compliance inspection performed on September 19, 2006 revealed the following:

1. The permit expired on July 31, 2004. No application has been sent in to reapply.
2. No DMRs or sampling records could be produced. No SWP3 on site as required. Not submitting DMRs.
3. Facility is sampling and Sherry Labs is doing analysis. There is some confusion over where sample results are.
4. No discharge at the time of inspection
5. Facility has a washrack under cover which is hooked to an oil water separator. All appears to be operating properly. Yard was visually clean and free of any spills. Facility washes the outside of tanks and storage boxes from offshore. Boxes and tanks are stored outside in the yard.
6. Facility has contacted a consultant to address the areas of concern.
7. Facility is trying to connect to city sewage to eliminate the discharge from the washrack.

C. DMR Review/Excursions – A DMR review of monitoring reports submitted with the application for the time period of January, 2004, through October, 2006 revealed the effluent violations listed below. There is no record of DMRs on file for the year 2003, the last three quarters of 2005, or the first two quarters of 2006. TOC was not tested in 2004 as required by the permit.

<u>Date</u>	<u>Parameter</u>	<u>Outfall</u>	<u>Reported Value</u>	<u>Permit Limits</u>
2 nd ¼ 2004	TSS	001	195 mg/L	45 mg/L
3 rd ¼ 2004	TSS	001	82 mg/L	45 mg/L
3 rd ¼ 2004	Oil & Grease	001	19.5 mg/L	15 mg/L
4 th ¼ 2004	Oil & Grease	001	41.2 mg/L	15 mg/L
4 th ¼ 2004	TSS	001	58 mg/L	45 mg/L
1 st ¼ 2005	TSS	001	100 mg/L	45 mg/L
3 rd ¼ 2006	TSS	001	57 mg/L	45 mg/L

8. EXISTING EFFLUENT LIMITS

Outfall 001 – the intermittent discharge of equipment washwater combined with stormwater runoff

Effluent Parameter	Monthly Average	Daily Maximum	Measurement Frequency
Flow - GPD	---	Report	1/3 months
TOC	---	50 mg/l	1/3 months
COD	---	125 mg/L	1/3 months
Oil and Grease	---	15 mg/l	1/3 months
TSS	---	45 mg/L	1/3 months
Visible Sheen	---	No Presence	1/day
pH – Allowable Range Standard Units	6.0 minimum	9.0 maximum	1/3 months

9. ENDANGERED SPECIES

The receiving waterbody, Subsegment 010803 of the Atchafalaya River Basin, has been identified by the U.S. Fish and Wildlife Service (FWS) as habitat for the Pallid sturgeon, which is listed as an endangered species. LDEQ has not submitted this draft permit to the FWS for review in accordance with a letter dated September 29, 2006 from Watson (FWS) to Brown (LDEQ). As set forth in the Memorandum of Understanding between the LDEQ and the FWS, and based on information provided by the FWS, LDEQ has determined that the issuance of the LPDES permit is not likely to have an adverse effect upon the Pallid sturgeon. Effluent limitations are established in the permit to ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. The more stringent of technology and water quality based limits (as applicable) have been applied to ensure maximum protection of the receiving water.

10. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

11. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

12. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List